

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT LOUISVILLE

UNITED STATES OF AMERICA)	
PLAINTIFF)	
)	
VS.)	CASE NO. 3:09-CR-85-S
)	
KAREN CUNAGIN SYPHER)	
DEFENDANT)	

MOTION TO CONTINUE TRIAL

* * * * *

Comes the Defendant, by counsel, and moves the court to reassign the trial date in the above-styled action. In support of this motion, counsel states as follows:

1. This case is currently set for trial on June 29, 2009.
2. Counsel for the defendant has been advised that there is additional discovery forthcoming from the United States. This discovery includes phone records which have been subpoenaed by the United States but have not yet been produced. Additionally, there are statements from other targets/witnesses which the United States has indicated will be forthcoming.
3. Given the complexities of this prosecution, the defendant feels that additional time is necessary in order for her to prepare properly for the defense of this action.
4. The defendant believes that any time related to such a continuance should be excludable under the speedy trial act, specifically 18 U.S.C. § 3161(h)(7)(A).

Respectfully,

/s/ Thomas E. Clay, P.S.C.
THOMAS E. CLAY, P.S.C.
Meidinger Tower, Suite 1730
462 S. Fourth Street
Louisville, KY 40202
(502) 561-2005
Counsel for Defendant

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was this 3rd day of June, 2009, was filed electronically with the Clerk of the Court using the CM/ECF System which will send a note of electronic filing to the following:

John Kuhn
Assistant United States Attorney
John.kuhn@usdoj.gov

/s/ Thomas E. Clay, P.S.C.